REMOVAL PROGRAM
AFTER ACTION REPORT
FOR THE
PARK STREET SITE
(b) (6)
BENNINGTON, BENNINGTON COUNTY, VERMONT
17 SEPTEMBER THROUGH 12 JULY 2013

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

CONTRACT NO. EP-W-05-042

TDD NO. 01-12-08-0005

TASK NO. 0826

DC NO. R-7528

Submitted By:

Weston Solutions, Inc.
Superfund Technical Assessment and Response Team III (START)
3 Riverside Drive
Andover, Massachusetts 01810

September 2013

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1.0 INTRODUCTION

The following report, entitled *Removal Program After Action Report for the Park Street Site, Bennington, Bennington County, Vermont,* is a chronological summary of the response actions taken by the U.S. Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch (EPRB). The report details the situation as it developed, actions taken, and resources committed.

Site activities included: conducting particulate air monitoring and air sampling for polychlorinated biphenyls (PCBs); and installing temporary lighting, performing decontamination of one residential basement.

2.0 SITE CONDITIONS AND BACKGROUND

2.1 Site Location and Description

The Park Street site (the site) is located on Park Street and Bowen Road in Bennington, Bennington County, Vermont. Geographic coordinates of the site are 42° 53' 27.9" north latitude, and 73° 11' 32.9" west longitude, as measured from the approximate center of the site (see Appendix B, Figure 1). The site consists of Little League baseball fields, two residential properties, and adjacent wetlands. The site is adjacent to the former Jard Company, Inc. (JARD) site, and is abutted to the west by the Bennington Square Shopping Center, to the north by Bowen Road and industrial properties, to the east by the former JARD site, and to the south by the Roaring Branch of the Walloomsac River (Roaring Branch) (see Appendix C, Figure 2).

2.2 Site History/Previous Actions

The site has been impacted by contamination from the former JARD site, a former capacitor and transformer manufacturing facility that produced capacitors, non-fluid transformers, and motors used in household appliances. JARD generated wastes associated with its manufacturing processes from 1969 to 1986. These wastes included PCBs; a variety of volatile organic compounds (VOCs), including trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and toluene; semivolatile organic compounds (SVOCs); waste hydraulic and lubricating oils; waste paints and varnishes; waste zinc oxide; waste-contaminated rejected capacitors; spent SpeediDri™; and PCB- and phthalate-contaminated wastewater. From September 2006 through August 2007, EPA conducted a removal action at the former JARD site, removing PCB-contaminated materials.

The Vermont Department of Environmental Conservation (VT DEC) raised concerns regarding surface and subsurface soil and groundwater contamination related to the site that is located down gradient of the JARD site. Recent sampling by VT DEC has detected PCBs in groundwater at properties located near the former JARD property, which is suspected to be the source of the contamination. Groundwater levels near the site are approximately 5 to 8 feet below ground surface. Groundwater infiltration at residential homes located near the site has been identified as a potential source of PCB contamination to soils and surface waters at the properties.

On 2 through 5 April 2012, EPA and START personnel mobilized to the site to conduct sampling as part of a Preliminary Assessment/ Site Investigation (PA/SI). Personnel collected 104 surface and

subsurface soil samples, 9 sediment samples, 6 surface water samples, and 4 floor sweeping samples from the site. All samples were screened on site for PCBs by the EPA Office of Environmental Measurement and evaluation (OEME) Mobile Laboratory. Approximately 10% of samples were also sent for laboratory confirmation PCB analysis at the OEME laboratory in North Chelmsford, Massachusetts (MA).

PCBs in the groundwater are suspected to be the source of contamination to soils and surface waters due to periodic infiltration into residential basements through inactive wells and other openings, and subsequent drainage via sumps and outfall pipes into yards and retention ponds. EPA samples of floor sweepings from the basement of a residential property detected PCBs at concentrations up to 14 ppm. PCBs were also detected in soils and surface water in a pond on a residential property, in the soil of sump areas located in the basements, in the soil at a nearby wetland, and in soil at the Little League field located along the JARD fence line.

3.0 SUMMARY OF FEDERAL RESPONSE ACTIONS

3.1 Organization of the Response

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) 5 Post Office Square; Suite 100 Boston, MA 02109-3912 (617) 918-918-1052	Daniel Burgo	EPA On-Scene Coordinator (OSC) responsible for the initiation, oversight, and completion of all removal activities. The OSC coordinated with State and local officials.
Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) 3 Riverside Drive Andover, MA 01810 (978) 552-2107	Christine Scesny	START Site Leader that provided the OSC with technical assistance, site documentation, site health and safety monitoring, air monitoring, and draft and final report preparation.
Environmental Restoration (ER) LLC 40 Messina Drive Braintree, MA 02184 (860) 769-7356	Christopher May	Response Manager (RM) for the ERRS contractor that performed removal activities. The RM was responsible for oversight and organization of mobilization, demobilization, and waste removal activities.

3.2 Mobilization and Site Preparation

The site-specific removal health and safety plan (HASP) was reviewed and signed by all personnel before any work commenced. In addition, emergency telephone numbers and directions to the hospital were posted and work zones were delineated. All activities were performed in appropriate personal protective equipment (PPE) in accordance with the HASP. The HASP was prepared by START personnel as a separate document, entitled *Health and Safety Plan for the Park Street Site, Bennington, Bennington County, Vermont*. On 17 September 2012, the mobilization and staging of Emergency Rapid Response Services (ERRS) equipment was initiated.

Site preparation activities conducted by ERRS personnel consisted: reviewing and signing the Health and Safety Plan, mobilizing site equipment and supplies, receiving delivery of supplies, and preparing staging area.

3.3 Chronology of Removal Activities

Week of 23 July 2012

EPA Office of Site Remediation and Restoration (OSRR) Division Director James T. Owens III, signed the Action Memorandum approving the proposed removal action.

Week of 10 September 2012

On 12 September 2012, a site walk was conducted with the following personnel: EPA On-Scene Coordinator (OSC) Daniel Burgo, ERRS Response Manager (RM) Chris May, and ERRS Forman Blake Mackinney. Activities for the day included:

- Reviewing and signing the HASP.
- Conducting a reconnaissance of the site property.

Week of 17 September 2012

Personnel on site:

OSC – EPA	Daniel Burgo
START – Weston Solutions, Inc.	Christine Scesny
ERRS Response Manager (RM) – Environmental Restoration LLC (ER)	Christopher May
ERRS Crew – ER	1 foreman 2 laborers

Equipment on site:

Type	Quantity
High Efficiency Particulate Air (HEPA) Vacuum	1
Truck	2
Storage Container	2
Portable Toilet	2
Dumpster	1

Activities for the week included:

- Mobilizing of crew and equipment.
- Reviewing and signing the site HASP.

- Conducting air monitoring for particulates, volatile organic compounds (VOCs), and explosive atmosphere as specified in the HASP.
- Decontaminating the basement areas and the items within the basement of (b) (6) using a HEPA vacuum and wiping the items and areas with cleaning products. The cleaning products used in the decontamination were Lestoil® and Pine-Sol®.
- Returning all basement items to their original locations after the decontamination activities had been completed.

On 22 September 2012, Northern Basement Systems representative Mike Doherty mobilized to the site to discuss the basement sealing of the two residential properties.

On 22 September 2012, decontamination activities had been completed and all personnel departed from the site. The basement sealing activities would be completed at a later date.

For the duration of the removal action, START photodocumented site activities (see Appendix C – Photodocumentation Log).

Week of 15 October 2012

On 17 October 2012, PCB air samples were collected by START to insure PCB contaminants had been removed during decontamination.

Activities for the day included:

- Reviewing and signing the HASP.
- Collecting air samples from the basement of (b) (6)

Week of 25 March 2013

Personnel on site:

OSC – EPA	Daniel Burgo
START – Weston Solutions, Inc.	John Burton
ERRS RM – ER	Christopher May
ERRS Crew – ER	2 laborers

Equipment on site:

Type	Quantity
Truck	1
Portable Storage Unit	1

Activities for the week included:

- Mobilizing of crew and equipment.
- Reviewing and signing the site HASP.
- Storing all items in the basement of (b) (6) in a portable storage unit for the duration of basement waterproofing activities.

- Waterproofing the basements at (b) (6) to insure protection against PCB contamination via flooding.
- Installing a polyethylene (poly) liner on the basement walls, and installing an inner drain/French drain at the base of the walls at (b) (6).
- Installing a sump pump in the basement of (b) (6).

Key dates:

On 27 March 2013, EPA OSC Burgo, ERRS personnel, and START member John Burton arrived on-site. ERRS crew removed all of the property owner's belongings from the basement at (b) (6) and temporarily stored them in a portable storage unit.

On 27 and 28 March 2013, Northern Basement System crew mobilized to site to conduct basement waterproofing activities at (b) (6).

On 28 March 2013, all personnel demobilized from the site.

Week of 13 May 2013

Personnel on site:

OSC – EPA	Daniel Burgo
START – Weston Solutions, Inc.	Kenneth Robinson
ERRS RM – ER	Blake Mackinney
ERRS Crew – ER	2 laborers

Equipment on site:

Type	Quantity
Truck	1
Portable Storage Unit	2
HEPA Vacuum	1
Portable Toilet	1

Activities for the week included:

- Mobilizing the crew and equipment.
- Reviewing and signing the site HASP.
- Installing a poly liner in a hallway leading from the bulkhead at (b) (6).
- Returning all basement items back to their original locations after the basement waterproofing activities were completed.

Key dates:

On 14 May 2013, EPA OSC Burgo, ERRS, and START member Robinson arrived on site.

On 15 and 16 May 2013, Northern Basement System crew mobilized to site to conduct basement waterproofing activities at (b) (6).

On 16 and 17 May 2013, Northern Basement System crew installed the subsurface drainage pipes at (b) (6).

On 17 May 2013, after the completion of the basement waterproofing activities the ERRS crew returned all of the temporarily stored belongings to the basement of (b) (6).

4.0 ESTIMATED COSTS OF THE REMOVAL ACTION

EPA resources committed under this Removal Action are summarized below:

Cost Category	Ceiling	Costs Incurred	Remainder
Regional Removal Allowance Costs			
ERRS	$500,000	$ 81,379.54.	$ 418,620.46
Other Extramural Costs Not Funded from the Regional Allowance			
START Contractor	$250,000	$35,201.00	$ 214,799.00
Extramural Contingency	$75,000	$ 0.00	$ 75,000.00
Total Removal Project Costs	**$825,000**	**$ 116,580.54**	**$ 708,419.46**

This accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

REFERENCES

[1] MicroPath U.S. Geological Survey (USGS). (7.5-minute series topographic) Quadrangle map: Bennington, Vermont.

[2] Bing Maps Aerial. 2010. Microsoft Corporation, Available from http://www.bing.com. Internet accessed 23 March 2012.

[4] Weston Solutions, Inc. START (Superfund Technical Assessment and Response Team). 2012. Field Logbook for the Park Street Site. TDD No. 12-03-0001.

[5] Weston Solutions, Inc. START (Superfund Technical Assessment and Response Team). 2012. Removal Program Preliminary Assessment/Site Investigation Report for the Park Street Site, Bennington, Bennington County, Vermont, TDD No. 01-12-03-0002. September.

[6] Weston Solutions, Inc. START (Superfund Technical Assessment and Response Team). 2013. Removal Program Preliminary Assessment/Site Investigation Report Addendum for the Park Street Site, Bennington, Bennington County, Vermont, TDD No. 01-12-03-0002. March.

[7] Vista Analytical Laboratory. 2012. Vista Project I.D.:34073, Case 0847F, PUF Air Sample. 7 November.

[8] U.S. Environmental Protection Agency. 2012. Office of Environmental Measurement and Evaluation. Laboratory Report. Project No. 12090038.Park Street – Bennington, VT – PCBs in Wipes. 15 October.

Appendices

Appendix A

Figures

Figure 1 - Site Location Map
Figure 2 - Site Diagram

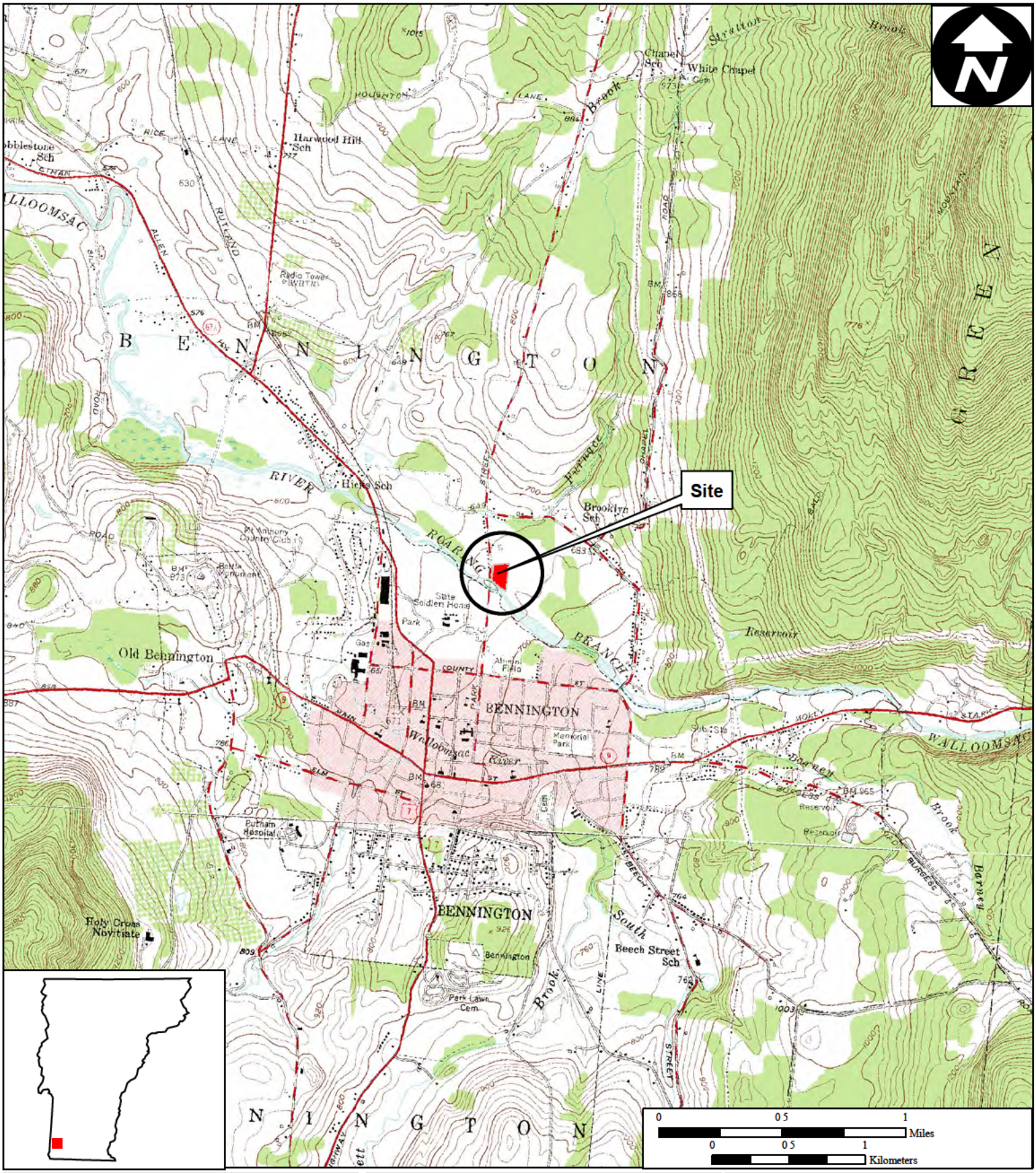

Figure 1

Site Location Map

Park Street Site
(b) (6)
Bennington, Vermont

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	12-08-0005
Created by:	E. Ackerman
Created on:	23 March 2012
Modified by:	K. Robinson
Modified on:	16 August 2013

Data Sources:
Topos: MicroPath/USGS
Quadrangle Name: Bennington, Vermont
All other data: START

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Figure 2

Site Diagram

Park Street Site
(b) (6)
Bennington, Vermont

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	12-08-0005
Created by:	E. Ackerman
Created on:	23 March 2012
Modified by:	Christine Scesny
Modified on:	28 June 2013

Legend

Approximate Property Boundaries

Feet

0 125 250

Data Sources:
Imagery: Bing Maps Aerial (Microsoft Corp)
All other data: START

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Appendix B

Photodocumentation Log

PHOTODOCUMENTATION LOG
Park Street Site ● Bennington, Vermont

SCENE: View of a well located in the basement of (b) (6) prior to decontamination.

DATE: 18 September 2012 **TIME:** 0759 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the northern basement wall at (b) (6) prior to decontamination.

DATE: 18 September 2012 **TIME:** 0759 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the northwestern basement wall at (b) (6) prior to decontamination.

DATE: 18 September 2012 **TIME:** 0800 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of a window located along the southern basement wall at (b) (6) prior to decontamination.

DATE: 18 September 2012 **TIME:** 0800 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the southern basement wall (to the right) at (b) (6) prior to decontamination.

DATE: 18 September 2012 **TIME:** 0800 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the central and eastern area in the basement at (b) (6) prior to decontamination.

DATE: 18 September 2012 **TIME:** 0800 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of a hall leading from the bulkhead door to the basement at (b) (6). Wet areas are visible at the base of the stone foundation wall.
DATE: 18 September 2012 **TIME:** 0801 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the negative air system used during decontamination activities at (b) (6)

DATE: 18 September 2012 **TIME:** 1321 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the location of particulate air monitor number (No.) 2 at (b) (6). Photograph taken facing north.

DATE: 19 September 2012 **TIME:** 0806 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the location of particulate air monitor No. 1 at (b) (6). Photograph taken facing northwest.

DATE: 19 September 2012 **TIME:** 0807 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the northwestern basement area at (b) (6) following decontamination.

DATE: 22 September 2012 **TIME:** 0913 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of wipe sample (WS) location WS-01 at (b) (6). The sample was collected following decontamination.
DATE: 22 September 2012 **TIME:** 1017 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of wipe sample location WS-02 (Duplicate WS-03) at (b) (6). The photograph was taken following decontamination.
DATE: 22 September 2012 **TIME:** 1022 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of wipe sample location WS-04 at (b) (6). The photograph was taken following decontamination.

DATE: 22 September 2012 **TIME:** 1025 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the northeastern basement area at (b) (6) following decontamination.

DATE: 22 September 2012 **TIME:** 1029 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the suspected effluent piping from the former sump pump system of (b) (6). Photograph taken facing south.
DATE: 14 May 2013 **TIME:** 1443 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of basement stairs after installation of a polyethylene (poly) liner at (b) (6). Photograph taken facing north.
DATE: 15 May 2013 **TIME:** 0858 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of stored materials staged on top of the poly liner in (b) (6) basement. Photograph taken facing north.
DATE: 15 May 2013 **TIME:** 0858 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of the poly liner on the wall and the French drain system in the (b) (6) basement.

DATE: 15 May 2013 **TIME:** 0858 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of stored materials and the furnace area of the (b) (6) basement after the installation of poly liner and a French drain system. Photograph taken facing east.
DATE: 15 May 2013 **TIME:** 0859 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of the sump pump system and poly sheeting installed in the northwest corner of the basement of (b) (6) Photograph taken facing west.
DATE: 15 May 2013 **TIME:** 0900 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of the aboveground storage tank (AST) that was staged on a crushed gravel platform after the installation of a poly liner and French Drain system in the basement of (b) (6)
DATE: 15 May 2013 **TIME:** 0901 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of effluent piping from the sump pump system from the (b) (6) basement. Photograph taken facing southeast.
DATE: 15 May 2013 **TIME:** 0907 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of the suspected location of the sanitary sewer piping as marked by the homeowner at (b) (6) Photograph taken facing south.
DATE: 15 May 2013 **TIME:** 0907 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

Appendix C

Table 1 - Summary of Polychlorinated Biphenyl Results, Wipe Samples Collected at (b) (6)

TABLE 1

SUMMARY OF POLYCHLORINATED BIPHENYL RESULTS
WIPE SAMPLES COLLECTED AT (b) (6)
PARK STREET SITE
BENNINGTON, VERMONT

SAMPLE LOCATION	WS-01	WS-02	WS-03	WS-04
SAMPLE NUMBER	R01-120917DB-0001	R01-120917DB-0002	R01-120917DB-0003	R01-120917DB-0004
SAMPLE DATE	9/22/2012	9/22/2012	9/22/2012	9/22/2012
SAMPLE SURFACE	WATER HEATER	COAL STOVE	COAL STOVE	FURNACE
	(b) (6)	(b) (6)	(b) (6)	(b) (6)
COMPOUND				
Aroclor-1016	ND	ND	ND	ND
Aroclor-1221	ND	ND	ND	ND
Aroclor-1232	ND	ND	ND	ND
Aroclor-1242	ND	ND	ND	ND
Aroclor-1248	ND	ND	ND	ND
Aroclor-1254	ND	ND	ND	ND
Aroclor-1260	ND	ND	ND	ND
Aroclor-1262	ND	ND	ND	ND
Aroclor-1268	ND	ND	ND	ND

SAMPLE LOCATION	WS-05			
SAMPLE NUMBER	R01-120917DB-0005			
SAMPLE DATE	9/22/2012			
SAMPLE SURFACE	SINK			
	(b) (6)			
COMPOUND				
Aroclor-1016	ND			
Aroclor-1221	ND			
Aroclor-1232	ND			
Aroclor-1242	ND			
Aroclor-1248	ND			
Aroclor-1254	ND			
Aroclor-1260	ND			
Aroclor-1262	ND			
Aroclor-1268	ND			

NOTES:

1) Samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using EPA Region I SOP, EIA:SOP-PCBWIPE1.SOP, PCBs in wipe sample.
2) All Results in Micrograms per wipe (µg/wipe).
3) ND = Not Detected.
4) Each wipe sample was collected over a non-porous surface area of 100 centimeters (cm) and preserved in 10 milliliters (ml) of Hexane.